

May 8, 2024

Ms. Rajinder Sahota  
Deputy Executive Office  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Potential Amendments to the Cap and Trade Regulation**

Dear Ms. Sahota,

Thank you for the opportunity to comment on the potential amendments to the California Cap and Trade Regulation as presented in the April 23<sup>rd</sup> public workshop. A-Gas is the world leader in lifecycle refrigerant management with a focus on greenhouse gas emission reduction through effective refrigerant management strategies. We are a long-time participant, as a carbon credit project developer, in the California Cap and Trade program and have developed numerous ozone depleting substances (ODS) destruction projects through the compliance offset program.

We are writing in support of the potential updates to the ODS destruction protocol, as discussed in the April 23<sup>rd</sup> public workshop. Specifically, A-Gas supports the inclusion of additional eligible ODS refrigerants, such as hydrochlorofluorocarbon (HCFC)-22, that have been phased out of production and importation in the United States for emissive uses. HCFC-22 (and certain other HCFCs) has been phased out of production and importation in the United States since 2020 and should therefore be treated as an eligible gas just as the chlorofluorocarbons (CFCs) that have been eligible under the ODS destruction protocol since program inception.

We also support the review and adoption of several concepts from the American Carbon Registry (ACR) protocol for Destruction of Ozone Depleting Substances and High-GWP Foam (versions 1.2 and 2.0). The ACR protocol updated several sections of the CARB ODS destruction protocol based on recent data. For instance, it includes updated emission rate assumptions for HCFC-22, allows ODS



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sourced from U.S. federal government installations, and provides a thoroughly revised section on foam handling and destruction with numerous updates to baseline assumptions, emission rates, foam eligibility, and destruction requirements. We believe that these updates could encourage the development of foam-based halocarbon destruction projects that have, to date, been extremely difficult to develop because of the challenging economics of these projects and because of the assumptions included in the November 2014 version of the CARB ODS destruction protocol. We encourage CARB to review, consider, and potentially adopt outright, many of the revisions and updates made in ACR's version 1.2 and 2.0 protocols.

Sincerely,

A handwritten signature in black ink that reads "Eric M. Ripley". The signature is written in a cursive style.

Eric Ripley  
Global Carbon Director  
A-Gas Group, Ltd.